

ORAL AND VIDEOTAPED DEPOSITION OF ASHLEY RUISE

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

C.M. COLLINS, N.J. LUNDY, §  
and R.C.L. MAYS, §  
Individually and on behalf §  
of all other similarly §  
situated, §  
§  
§

Plaintiffs, §  
§  
§

VS. § NO. 4:22-cv-1073

CATASTROPHE RESPONSE UNIT, §  
INC. and CATASTROPHE §  
RESPONSE UNIT USA, INC., §  
§  
§

Defendants. §

ORAL AND VIDEOTAPED DEPOSITION OF

ASHLEY RUISE

OCTOBER 12, 2023

VOLUME 1

(Reported Remotely)

ORIGINAL

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1 ORAL AND VIDEOTAPED DEPOSITION of ASHLEY  
2 RUISE, produced as a witness at the instance of the  
3 Defendants, and duly sworn, was taken in the  
4 above-styled and numbered cause on the 12th of  
5 October, 2023, from 9:32 a.m. to 6:15 p.m., before  
6 Kathy E. Weldon, CSR in and for the State of Texas,  
7 reported by machine shorthand, at the residence of  
8 Ashley Ruise, 1924 SW 4th Street, in the City of Fort  
9 Lauderdale, County of Broward, State of Florida,  
10 pursuant to Notice and the Federal Rules of Civil  
11 Procedure.

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1           A. About the lawsuit, yes. She called and  
2 checked on me, but it had nothing to do with the  
3 lawsuit.

4           Q. You and Rasheedah still keep in touch? You  
5 just haven't spoken about the lawsuit?

6           A. Yeah. Every blue moon she'll -- will call  
7 and just see how life's been treating you.

8           Q. What about Basil? Do you still keep up with  
9 Basil?

10          A. Every blue moon.

11          Q. And you've talked to Basil several times  
12 since the end of 2022 when you visited about the  
13 lawsuit. You just haven't discussed the lawsuit with  
14 him?

15          A. Right, right.

16          Q. Have you talked about this lawsuit or your  
17 allegations in this lawsuit with anyone other than  
18 your attorneys, Basil, and Rasheedah?

19          A. No, sir, I haven't talked to anyone else.

20          Q. Did you know that your lawyers told us on  
21 September 29th, 2023 that you were still in possession  
22 of the laptop computer that was loaned to you in  
23 connection with your last deployment by CRU?

24          A. Yes, sir.

25          Q. And when did your last deployment with CRU

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1 saying good night if nobody else is on Teams.

2 Q. Well, how would you know -- how would we know  
3 that you worked past other people's good nights? I  
4 mean, how would we know when you stopped working?

5 A. If you go and look at the -- the -- the  
6 spreadsheet, everything we did still had to go on that  
7 spreadsheet. I mean, even if I did work overtime,  
8 what we were doing was -- it wasn't included for that  
9 day because -- I mean, not overtime.

10 If I worked over my hours, we wouldn't  
11 include for that day. It would be on the spreadsheet,  
12 and we'd just put it for the next day because  
13 everything for that day is already concluded and done,  
14 so we'll just spread it out for the next day, and then  
15 it goes into like that.

16 Q. Let's go back to Exhibit No. 3, which are  
17 your interrogatory answers.

18 A. Uh-huh.

19 Q. And let's go to No. 4 in particular.

20 You state -- or you're -- you're asked  
21 for each request or, as you know -- or request or  
22 admission that you denied. Please explain the basis  
23 for your denial. And one of the things that you  
24 stated in there is that you could not work another job  
25 while working for CRU.

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1           A. Yes.

2           Q. Now, who at CRU told you that you were not  
3       allowed to work another job while working for CRU?

4           A. I can't remember exactly who it was, but I  
5       remember us having a meeting. We was inside of a  
6       meeting, and it was said.

7           Q. One time?

8           A. Oh, multiple times. Because they knew that  
9       people was working other jobs, and they was  
10      complaining about, hey, guys, you can't work two  
11      deployments. We need you guys to focus, you know, on  
12      what we have here in front of you. You can't work --  
13      it's impossible.

14           They were where it's impossible for you  
15      to work two deployments on this job. If you're  
16      working on two deployments, we know you're not getting  
17      the work done. So, I mean, that was -- that was in --  
18      over the -- I don't have it written down, but that was  
19      definitely said to us more than once in meetings.

20           I can't remember who, but it always  
21      popped up every so often, I guess, when he found out  
22      somebody was working another deployment --

23           Q. But you can't remember --

24           A. -- or reiterated.

25           Q. -- (overtalk) or when?

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1           A. I can't remember when, but I know that it was  
2 reiterated.

3 Q. Now, this statement that you allege was made  
4 several times was different than what you had  
5 previously understood from your independent contractor  
6 agreement with CRU, right?

7           A. Yes. I thought that as an independent  
8 contractor, that you could work different deployments  
9 if you choose to, but I guess they didn't want it.

10 Q. Well -- but -- but did -- did you recognize  
11 that at the time when you heard it, that this was  
12 different than your -- the representations in your  
13 independent contractor agreement?

14 A. Yes.

15 Q. And did you ever ask any of the other  
16 adjusters or anyone else at CRU whether what you had  
17 supposedly been told was true?

18           A. To be honest, I never doubled-down on it  
19 because I wasn't trying to work no second job working  
20 at CRU: There was enough work for me to work this  
21 one, so I didn't say, hey, is this true? We can't  
22 work a second? I didn't care to work a second job.

23 So to be -- I heard it. I've heard it  
24 plenty of times, but I never indulged in it because I  
25 wasn't trying to work a second job.

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1 course of the day, right?

2 A. Yes.

3 Q. And by the way, no one wants to work  
4 somewhere where the expectations are unreasonable.

5 A. You're absolutely right.

6 Q. And -- and that's why you self-released in  
7 July of 2002 -- 2022, because you thought "I'm working  
8 really hard, and I'm incredibly frustrated, and I'm  
9 still supposedly not doing enough around here. I just  
10 can't win."

11 Sound about right?

12 A. Yes.

13 Q. You never lost pay for not completing enough  
14 work or where CRU is being disappointed with your  
15 work, right?

16 A. Yeah, yes.

17 Q. Were you ever told that you had to get  
18 approval in advance to take time off?

19 A. Yes, we do have to get approval in advance to  
20 take time off. But I never took it off, so -- but I  
21 was told that you do have to let them know before if  
22 you did.

23 Q. Okay. That's the question.

24 A. Uh-huh.

25 Q. Were you ever told that you and other

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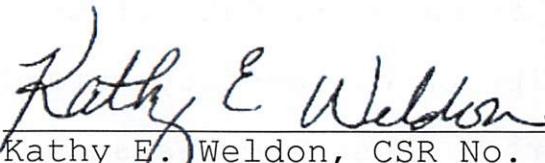
1 STATE OF TEXAS )

2 COUNTY OF DALLAS )

3 I, Kathy E. Weldon, Certified Shorthand  
4 Reporter, in and for the State of Texas, certify that  
5 the foregoing deposition of ASHLEY RUISE was reported  
6 stenographically by me at the time and place  
7 indicated, said witness having been placed under oath  
8 by me, and that the deposition is a true record of the  
9 testimony given by the witness.

10 I further certify that I am neither counsel  
11 for nor related to any party in this cause and am not  
12 financially interested in its outcome.

13 Given under my hand on this the 27<sup>th</sup> day of  
14 OCT, 2023.

15   
Kathy E. Weldon



16 Kathy E. Weldon, CSR No. 6166  
17 Bradford Court Reporting, L.L.C.  
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23 My Commission Expires 10-31-2025

24 Time used by each party:

25 Mr. Travis Gasper - 0:00

Mr. Monte K. Hurst - 6:43